

**Weisberg Law**

*Attorneys & Counselors at Law*

LICENSED IN PA & NJ

7 SOUTH MORTON AVENUE  
MORTON, PENNSYLVANIA 19070

PH: 610.690.0801

FAX: 610.690.0880

Additional Offices

Philadelphia, Pa

Bala Cynwyd, Pa

*Matthew B. Weisberg*\*^

*L. Anthony DiJiacomo*~

*David A. Berlin*^

*Robert P. Cocco*~+

*Gary Schafkopf*^+

*Brian Mildenberg*~+

*Marc Weisberg*~+

*Yanna Panagopoulos*~+

\*NJ & PA Office Manager

^Licensed in PA & NJ

~Licensed in PA

+Of Counsel

Web-Site: [www.weisberglawoffices.com](http://www.weisberglawoffices.com)

E-Mail: [MWEISBERG@WEISBERGLAWOFFICES.COM](mailto:MWEISBERG@WEISBERGLAWOFFICES.COM)

*Friday, December 15, 2017*

**Via ECF**

The Honorable Ashley M. Chan  
United States Bankruptcy Court  
Eastern District of Pennsylvania  
Robert N.C. Nix Sr. Federal Courthouse  
900 Market Street, Suite 214  
Philadelphia, PA 19107

RE: Carmen J. Alicea, Debtor  
U.S. Bankruptcy Court – Eastern District of Pennsylvania (Philadelphia)  
No.: 16-12596

Dear Sir or Madam:

Kindly be advised we have recently been retained to represent creditor, Rafael Sandivar. Our entry of appearance will follow under separate cover.

A state court Ejectment of debtor proceeds.

Pending before this Honorable Court is debtor's Motion to Set Aside Sheriff's Sale, et al (Doc. No. 49). This Motion is scheduled for hearing on Tuesday, December 19, 2017.

Debtor has filed a certificate of no objection-which we request the Court strike.

Creditor Sandivar respectfully requests an adjournment of this hearing. To that end, Sandivar vigorously objects to and contests the Motion.

Towards Sandivar's objection, it is respectfully suggested that, among others, this Honorable Court does not have jurisdiction to set aside a state court Sheriff's Sale; and alternatively, must abstain from so doing. Aside from the aforesaid jurisdictional issue, debtor cannot set aside a Sale after the Sheriff's Deed Poll has been recorded.

Regarding Sandivar's request for adjournment, Sandivar desires to file a formal response in opposition to the above-referenced motion – with perhaps a request for sanctions. The undersigned having just recently been retained, and as Sandivar does not speak English, we would respectfully suggest adjournment proper.

Thank you for this Honorable Court's consideration of this informal objection/contest as well as request for adjournment and to strike the certificate of no objection. Of course, if Your Honor requires anything further, Sandivar and his below counsel will abide this Honorable Court's directive.

Sincerely,

/s/ Matthew B. Weisberg  
MATTHEW B. WEISBERG

MBW/hcm  
Cc: David M. Offen, Esq.